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UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

PLAINTIFF, STEPHEN BECKMAN'S OPPOSITION TO THE DEFENDANT, BULL HN INFORMATION SYSTEM, INC.'S MOTION TO DISMISS

The Plaintiff, Stephen Beckman, opposes the Defendant, Bull HN Information Systems, Inc.'s Motion to Dismiss. As set forth in detail in the Memorandum of Law submitted herewith and incorporated, the Plaintiff has not failed to state a claim, he has not failed to comply with the procedural requirements for asserting claims under the Age Discrimination Act, the Employee Retirement Income Security Act, and Massachusetts General Laws Chapter 151B, and has pled the required elements of a viable cause of action. Therefore, the Defendant's Motion to Dismiss should be denied.

Respectfully submitted, The Plaintiff,

By his attorneys,

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